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Governor

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Lieutenant Governor

State of Utah
DEPARTMENT OF NATURAL RESOURCES

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Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

June 10, 2008

Mike Brown
Graymont Western US Inc.
3950 South 700 East, Suite 301
Salt lake City, Utah 84107

Subject: Initial Review of Fingers Project, Graymont Western U.S. Inc., Cricket Mountain Quarry, M/027/006, , Millard County, Utah

Dear Mr. Brown:

The Division has completed its review of your amendment to the Notice of Intention (NOI) to Commence Large Mining Operations for the Cricket Mountain, submitted 4/28/08. The Division has determined this change to the NOI to be a revision, requiring public notice. The attached comments will need to be addressed before tentative approval may be granted.

The comments are listed below under the applicable Minerals Rule heading. Send replacement pages of the original notice **using redline and strikeout text** and indicate how these are to be incorporated into the current approved plan using Form-MR-REV-att found on the Divisions web page or replace the entire document. After the notice is determined technically complete you will be asked to send us two final clean copies, one will be returned.

The Division requests that submittals are made according to the following format. Notices and changes should be three hole punched, maps folded and placed in a plastic 8 ½ by 11 sleeve, and binders provided for new notices, revisions, applications, or other changes of 30 pages or more (binders need only be provided once). An additional electronic copy is appreciated. You may request some proprietary information relating to the location, size, and nature of the mineral deposit to be kept confidential. Confidential information must be clearly marked and provided in a separate binder.

The amendment includes some cultural resource information, but it is very difficult to compare the maps in the cultural resource survey reports and the maps in the plan and determine what areas were surveyed in relation to the areas proposed to be disturbed. According to the State Historic Preservation Officer (SHPO), the Cricket Mountains are known for relatively high site density. Have all of the proposed disturbed areas been surveyed? If so, which significant sites are within the proposed disturbed area. If the proposed disturbed areas have not been surveyed, the Division recommends that surveys be conducted and the potential effects on cultural resources determined. Two copies of the surveys are requested since SHPO has requested that all surveys be submitted through the Division. Survey information disclosing archeological sites should be marked as confidential and submitted under separate cover.

If you have any questions in this regard please contact me, Tom Munson, Paul Baker or Beth Ericksen of the Minerals Staff. If you wish to discuss this review, please contact us at your earliest convenience. Thank you for your cooperation in completing this permitting action.

Sincerely,

Susan M. White

Susan M. White
Mining Program Coordinator
Minerals Regulatory Program

SMW:tm:pb
Attachment: Review, Form MR-REV-att
P:\GROUPS\MINERALS\WP\M027-Millard\M0270006-CricketMtn\Final\LMO -REVIEW-fingers.doc

INITIAL REVIEW OF NOTICE OF INTENTION TO COMMENCE LARGE MINING OPERATIONS

Graymont Western U.S., Inc.
Fingers

M/027/0006

R647-4-101 – Filing Requirements and Review Procedures

The Cricket Mountain mining and reclamation plan is composed of several projects. In order to find the most complete maps and surety information one has to look at the last project completed. This is confusing. The Division suggests that an overview of the entire Cricket Mountain Quarry be provided, including a Table of Contents and map as the first volume and each project sequentially numbered. (SW)

Please check the comment under 1.2 "File Number". It indicates the last Division approved revision was in Dec. 2007. Was it actually a revision or an amendment? Will you please be specific and indicate the project name? It is helpful information due to the size and structure of the permit. (BE)

R647-4-105 - Maps, Drawings & Photographs

General Comments:

There is a haul road to be built between Flat Iron and Fingers. Please show this road on one of the maps. If it is already included, please be more concise regarding which road it is. (BE)

MAPS:

Figure 5:

It would be helpful to superimpose the geology on these maps. Also include tick marks on the bar scale if possible. It is apparent that the cross sections represent post mining scenario because Figure 7 reveals that, but it would be helpful if a label was included on Figure 5 to identify at glance these are reclamation cross sections. (BE)

Figure 7:
The reclamation map appears to show the area including areas that are revegetated. (BE)

105.1 Topographic base map, boundaries, pre-act disturbance

Show location and label the well providing water for this project. (BE)

105.1.13 Please show access route to the mine with labeled highways and road names. (BE)

105.3 Drawings or Cross Sections (slopes, roads, pads, etc.)

3.15 The plan does not clearly show all the hydrologic designs and features to be incorporated into the plan. Please update the figures to show the location of berms, swales, culverts, and drainages. (TM)
3.16. Submit watershed maps and the supporting calculations that verify the size of storm events in terms of flow. These calculations need to apply to both the operational structures of the mine and the reclaimed structures of the mine. Operational and reclaimed structures should be designed to appropriately protect the public and the environment. Generally designs are based on a 10 year-24 hour storm during operations and the reclaimed structures designed for the 100 year-24 hour storm, however this is up to the operator to determine. (TM)

The plan indicates the minimum thickness is 6-in for salvageable soils, what is the maximum thickness? Show these areas on a map including extracted thicknesses by area. This comment is a repeat. (BE)

R647-4-106 - Operation Plan

106.2 Type of operations conducted, mining method, processing etc.

In section 2.1 of the submittal it outlines the project components and explains that crushing occurs 'near the quarry'. Please elaborate. Does that mean within the project area or in a different project area? The statement indicates that a crusher is one of the project components. Show on a map and specify in the narrative if it is within the Fingers Quarry area. If it isn't, be specific in its location. (BE)

Please describe the designed 'buffer zone' area. Include dimensions. (BE)

The Division prefers a description of the quarry design and not continuing the practice of referring to Poison Mountain and Flat Iron quarry experience and on standard industry experience as an appropriate explanation for site mining operations. The Poison Mountain plan does not provide any more/less information. This quarry is independent of Poison Mountain and Flat Iron, so please provide narrative specific to this site only. (BE)

What is the pit operating slope angle(s)? (BE)

Describe how the design will account for handling deleterious materials within the quarry area to avoid adverse impacts to water systems. (BE)

Are the loaders being serviced within the quarry area? If so, describe how hazardous chemicals and wastes are addressed. (BE)

Are roads within the quarry area? Please describe and elaborate on size, management, and grades. (BE)

Does precipitation accumulate and stand on the pit floor or in the quarry area? It is assumed the 'puddles' are small, but it is helpful to provide information about maximum size and depth. (BE+TM)

Show the location of the water collection berms on a map. This comment is repeated under maps. (BE+TM)

What is the source of the 1.3 million tons of material that used as pit backfill? (BE)

Is any of the material to temporarily kept in a reserve pile? If so, provide dimensions, height, maximum volumes and duration kept there. (BE)

The Division would like a list of equipment used in operations. This information can be provided in table form. There is a general overview provided in 2.4.10. Please expand to include the table. (BE)

Will there be limestone fines that will be stored? (BE)

Explain the difference between the 8.4 million tons of overburden excavated and the storage of 7 million tons of overburden. (BE)

In table 2-2, include slope angles for the overburden piles. (BE)

The narrative explains two dump building techniques. Explain what will drive the decision about which technique will be used. (BE)

Please provide more information about deleterious materials and their management. If none exist, please make such a statement. (BE)
Page 13, 2.4.5, indicates that screened undersized materials will be stockpiled either at Poison Mountain or in the newly permitted stockpile area, defined to be an extension of the Poison Mountain undersized stockpile. Further explanation is required, it is unclear what is meant by the newly permitted stockpile area. When did this approval occur? Is in within the Poison Mountain plan? (BE)

There is a haul road to be built between Flat Iron and Fingers. In the narrative, please include which map this road is shown. (BE)

106.3 Estimated acres to be reclaimed and/or disturbed annually
The narrative provides an estimated quantity of mineable material and overburden; however, more information is required, such as anticipated yearly tonnages mined and acres. If reclamation is to occur on an annual basis, please provide the number of acres that will be reclaimed. Please provide the expected mine life in years. A portion of this comment applies to 106.4 (BE)

106.4 Nature of materials mined, waste and estimated tonnages

Overburden information is provided in section 2.4.3, please describe the composition and characteristics of the overburden materials. See further elaboration under Impact Assessment. (BE)

What is the overburden depth range (in feet)? An ore to overburden ratio would be helpful. (BE)

Please consider the placement of signs, or mention that blasting protocols will be followed. Operator response to this statement can be within R647-4-109.4 or Impact Assessments. (BE)

Please provide overburden placement sequencing and explain if material segregation occurs in each of the three overburden dumps. If so, describe the material segregation plan. (BE)

There have been discussions about the minimum bench widths within the Big Sage review. The Division concern is that if the minimum bench widths are dependent on equipment, does that mean there is a width margin already allowed in the event there is backbreak and/or rockfall? (BE)

106.5 Existing soil types, location, amount
Page 13 of the draft indicates that 168,500 cubic yards of topsoil will be salvaged, but Table 2-3 shows the volumes of the stockpiles being 178,600 cubic yards. Is this the *capacity* of the stockpiles vs. the actual amount that is anticipated to be salvaged? (BE and PBB)

Provide topsoil piles slope angles. (BE)

The plan indicates there is a buffer space around the piles. Please provide more detail including design information. (BE)

106.6 Plan for protecting & redepositing soils
Within section 2.4.3 there is a commitment to salvage growth media and store it where it is 'practical and safe'. The plan must be specific and have an assigned location, which appears to be identified in Figure 3. Consider re-wording this statement. (BE)

The plan states that suitable material will be removed where practical. Please define and outline limitations. Page 10 of the SRK report in Appendix B is more specific about how much soil should be salvaged from specific types of areas. The Division recommends using these guidelines with two exceptions. The report suggests avoiding boulders and large cobbles as they will make seeding more difficult. Rocks can be very beneficial for establishing vegetation and controlling erosion, and, as far as possible, they should not be excluded. Additionally, the SRK report suggests scraping the top two inches of cheatgrass-infested soil and putting it off to the side. Page 13 of the plan says this soil will

be put at the bottom of stockpiles which is probably the better way to handle it. (BE and PBB)

Equipment: Will scrapers be used to salvage growth media? Please explain how the junipers will be handled. (BE)

Please provide information regarding choice of soil placement locations with consideration to isolation, protection, erosion, run-on etc. (BE)

The plan indicates the minimum thickness is 6-in for salvageable soils, what is the maximum thickness? Show these areas on a map including thicknesses by area. This comment is a repeat. (BE)

106.8 Depth to groundwater, extent of overburden, geology

Provide the depth to groundwater. What time of year was depth to groundwater measured? (BE+TM)

Has drilling within the Cricket Mountain permit area encountered water? Please provide elaboration. (BE+TM)

R647-4-109 - Impact Assessment

There is a plan statement located on page 20 of the draft that indicates the mine will operate according to MSHA regulations. It is important for the operator to know that mining operations must be performed and operation design must accomplish the requirements of the Utah Mined Land Reclamation Act. This comment has been repeated from other Graymont reviews. (BE)

The maps that are included in appendix B should have the sections clearly identified. It would be useful to overlay the Fingers disturbance over the 'project area' for clarity. (BE)

Based on the submitted maps, it appears the Wildlife Guzzler will be affected, however there is no information in the plan about its removal. (BE)

The Division appreciates the efforts and strides that Graymont has made to address impacts as outlined in the following statement. However, more specifics regarding mitigation is necessary. Although a general outline is provided, sometimes there's too much general activity information without explaining under what circumstances any of the remedial actions will be used. *Boiler plate comment:* When addressing this section, please state the potential impacts that may occur as a result of mining operations. The NOI provides background, historical, conditional, and location information but does not indicate the impact of mining operations on the environmental factors that are described in R647-4-109. For example, in section 6.4.2, information is provided about runoff in terms of how precipitation falls on the highwall face, quantity, and some general run off

behavior patterns, among other descriptions, but neglects to describe the impacts of mining operations regarding erosion. To develop this understanding further, an example: a mine operation has large disturbed land areas (impact) and erosion control is a fundamental requirement. One could then identify that because of the nature of the mine's size, erosion and increased/altered sediment loading will occur. Impact locations would be identified among and outside of the large disturbance. These locations could be: roads, piles, local topographic variability, stream, drainages, and slopes to name a few. Finally, a description of the actions that will occur to mitigate the impacts associated with these sediment loading locations should be included. The impact of mining operations because of its large disturbed area would not be the only mining related impact regarding erosion. Another impact could be how the pit configuration creates erosion risks because of steep slopes in consolidated and unconsolidated materials. Again, once the environmental concern related to mining operations is identified, then mitigation measures, plans, and controls are developed via narrative, drawings and maps. The Division suggests using this approach with each of the environmental events in R647-4-109. (BE+TM)

109.1 Impacts to surface & groundwater systems

Please include a narrative providing a hydrologic overview of the area. (BE+TM)

Explain the overburden and topsoil pile designs from an erosion and run-off perspective. (BE+TM)

Please provide more information about the water source for the mining operations. Identify the source well location and distance to the project area. See map comments. (BE+TM)

The plan mentions several actions and tasks associated with precipitation events, but they are general in nature. Specifics are required. Break the project into impact areas and define the mitigation efforts associated with those areas. For example, information is needed about how runoff/runon and sediment will be controlled on the outslopes of the waste piles, how about the waste dumps surface areas? Be specific, and please make an effort to limit that a particular action will be taken 'as needed'. (BE+TM)

On page 25 of the draft NOI, a sentence reads, "Surface waters will be managed to avoid excessive sediment loading and run off outside the project area". The Division assumes the project area is equal to the permit area, if that is the case, designs must be such that sediment from the disturbed areas is controlled. It is considered a violation if uncontrolled sediment flows outside of the permit area. (BE+TM)

When was this depth to groundwater determined, including time of year? Where was it measured? Have seasonal or yearly variations been recorded? (BE+TM)

109.3 Impacts on existing soils resources

The plan narrative indicates that explosives, explosive packaging are handled according to federal and state requirements or according to manufacturing requirements. Do these requirements outline operator/worker safety only? Or do they include provisions to ensure

environmental impact is minimized? If they don't, please specify and outline how they will be managed. (BE)

AIR QUALITY

Provide a copy of the Air Quality Approval Order as an appendix to the plan including the dust control plan. (BE)

Section 2.4.12 provides an overview about the blasting plan. Please provide additional information about how dust from blasting is controlled, and how fly-rock is minimized. (BE)

EROSION CONTROL

The plan indicates that overburden piles will be visually monitoring following a precipitation event to ensure drainage and sediment control methods are effective. The plan should include drainage designs and sediment controls for the waste piles. The plan indicates these slopes are 35° or less, so drainage designs, berms, etc must be outlined and explained. (BE+TM)

The narrative indicated that "under certain rainfall conditions" water would travel along berms to catch basins. Please describe the 'certain rainfall conditions' in more detail. (BE+TM)

Describe and show the locations of the catch basins. (BE+TM)

The plan explains that the quarry will intercept three ephemeral drainages, but there is no plan regarding what actions are implemented to minimize environmental adversity. What are the changes due to grading or fill activities on the drainage patterns. (BE+TM)

Section 2.4.16 states that surface waters will be managed to avoid excess sediment loading to run off outside the project area. The site must be managed in such a way that no uncontrolled run off occurs. (BE)

The plan references the storm Water Pollution plan that's located in Appendix B of the Alsops Quarry plan, but the Storm Water Plan needs to be amended to include the affects of this operation. In addition, just as a note, the SWPPP is not located in Appendix B. *There is a statement in the plan, page 16, that BMP's will be used to limit erosion and reduce sediment, then there is a general overview provided about each BMP that will be used. The information contained within this narrative does not correlate to the SWPPP in the Alsop plan. Make adjustments.* (BE+TM)

Identify the sources of sediment as a result of run off. There is an outline of BMP's, however, it is too vague. Specifically, where are the areas that have been identified that

require permanent erosion and sediment controls? Is there a map that shows this information? (BE+TM)

STABILITY

Some Mining operations will result in vertical bench faces, how will they be maintained? (BE)

There is concern regarding actions to mitigate problems associated with stability and how they are managed at the time they occur. Please provide general statements about the actions associated with evaluation and mitigation. Is the pit design conservative enough to take into account the lack of detailed knowledge regarding the extent of faults and fractures? (BE)

The plan indicates that slopes have been designed on bedding orientation and economic overburden cut-off. What about design based from a stability perspective? (BE)

Are there any nearby springs that will affect stability? (BE)

The plan indicates that no large-mass stability safety issues have been encountered at any of the quarries. Have any adverse stability issues been identified that should be accounted for including providing a mitigation action plan. (BE)

PUBLIC HEALTH AND SAFETY

Blasting: Please refer to related comment under 109.4-air quality. This location may be an appropriate placement addressing safety associated with blasting. Especially relating to signage. (BE)

Please ensure that the plan commits to ensuring that MSHA safety guidelines are followed and that the UDOGM mining plan is adhered to. (BE)

Section 2.4.13 indicates that diesel, gasoline and oil will be managed according to industry standards and state and federal guidelines. It is unclear if the mentioned standards and guidelines address the management of these materials from an environmental perspective. Please be more specific about how these are managed to mitigate environmental impacts. (BE)

The plan mentions an existing bone yard, but there is no indication of where it's located. Please explain. If it's located within the project area, it should be identified on a map. (BE)

Are any combustible materials stored in the boneyard? (BE)

The plan indicates that no toxic or hazardous chemicals are on site. Is there any trash in this area? If so, explain how it is managed (routinely hauled off-site etc.) (BE)

In 2.4.15 of the plan it explains that the access road is restricted to employees and authorized visitors. Are there gates in place? Signs? How does one know they are in a restricted area? (BE)

Is signage in place advising that blasting takes place on-site? (BE)

Quarry area: Do regular and routine inspections occur to identify slope problems and to ensure the quarry is being mined at the appropriate angles? (BE)

109.4 Actions to mitigate any impacts
The Division recommends that the project be commenced outside the nesting season for raptors which is generally about February 1 to August 31. The actual times vary depending on location. Equipment operators need to be made aware that destroying nests—even inactive nests—of these species is illegal, and they need to be instructed to report the presence of nests if they are found. The project area contains potential nesting habitat for golden eagles, ferruginous hawks, burrowing owls and prairie falcons, and nests of these species can be very difficult to locate even with aerial surveys. Although a survey was conducted, there could still be nests in the area. (PBB)

The wildlife guzzler in Section 26 of Township 21 South, Range 10 West should be re-located. Water is an important and rare resource for wildlife in this area. (PBB)

R647-4-110 - Reclamation Plan

110.1 The reclamation goals and objectives do not mention any effort to ensure the topography of the area will be such to accommodate the post mining land use, including its stability. (BE)

The statement that erosion will be minimized is deserving of credit, however, is it necessary to indicate how this will be achieved in this location of the plan? (through berms per 4.3). In section 4.5 there is a statement that indicates erosion will be managed through other actions outside of berms. (BE)

In section 4.4 the plan indicates that haul roads within the quarry will not be reclaimed. It is assumed that the roads will be 'mined through', however, to the public, the statement appears that roads are remaining and a variance is not requested. This statement may have to be reworded or a variance requested. It should be assumed that all roads will be reclaimed and the bond estimate should reflect that. (BE)

110.2 Roads, highwalls, slopes, drainages, pits, etc., reclaimed

Please provide a table that includes the active slope angle and reclamation slope angle of the waste dumps. Include active and reclamation heights as well. (BE)

It is helpful to include a description of the native slopes where the waste dumps will be located. Please describe the surface material as well. (BE)

An outline must be provided and a map included that shows the areas that will be regraded, recontoured, topsoiled, and show location of erosion controls such as riprap and BMP's (seeded is already shown). There is a comment that floors will not be reclaimed. The Division expects actions to ensure shaping and stabilizing the areas will occur. These actions are considered 'reclamation', therefore the statement in 4.4 should be reworded. Futhermore, section 4.5 mentions the site will be stabilized, which is in conflict with the statement in 4.4 (BE)

Please outline actions associated with monitoring or visual type inspections will occur? (BE)

During the early phases of reclamation, it is assumed some roads will be needed to access disturbed areas. Please describe how these roads will be maintained during this phase. (BE)

In the narrative, please state the acres associated with each reclamation task. (BE)

You are actually benching the waste dumps? If that is the case, provide bench heights, bench widths, and bench face angles. The paragraph is confusing, because if the outerslope is benched, then which sloped areas will be contour furrowed? (BE)

The waste pile surfaces will be seeded but not graded and contoured in any way? (BE)

There are several comments throughout the plan that are dependent on the availability of soils for reclamation. Since this appears to be the limiting factor, the plan must describe an alternate practical procedure to ensure erosion is minimized and controlled. If there is a commitment to ensure these actions will occur, it is unclear due to sentences like "portions of haul roads that extend into the quarry will be reclaimed if sufficient soil resources are available". There is no alternative suggested. (BE)

110.5 Revegetation planting program

There is no technical or practical reason why the 120-foot dumpfaces can't be revegetated. Figure 7 shows these slopes will not be revegetated and the narrative explains that regrowth material is the limiting factor. What is the depth of overburden material to be placed on the dump surface and 'benches'? (BE)

Figure 9 shows some areas where no revegetation will be done, and Section 4.6.3 says slopes of the overburden/fines piles that are recontoured to an angle safe for equipment will be covered with a layer of soil and seeded.
This appears to be a variance, and the plan needs to include either a variance request with adequate justification or it needs to show why this is not a variance. If the overall site, including these unvegetated areas, will have 70 percent of the premining vegetative cover, then no variance request is needed. If a variance is requested, it will need to show the variance requested and the area that would be affected, justification for the variance, and alternate methods or measures to be utilized. (PBB)

Table 4-4 shows a reclamation seed mix.
The Division recommends adding Vavilov or Vavilov II Siberian wheatgrass (*Agropyron sibericum*) at a rate of about 1-2 pounds PLS/acre. This species is very drought tolerant and has been shown to compete well with cheatgrass. (PBB)

R647-4-112 – Variance None requested

R647-4-113 – Surety

General: It is helpful to provide a surety narrative in addition to the spreadsheets that includes assumptions and thoughts. In addition, each reclamation category can be fully explained in the narrative. (BE)

In table form, please provide a list of equipment and quantities used in operations. Please be specific. For example, if using loaders, please describe size and brand. (BE)

Spreadsheets:

R647-4-113 – Surety

Escalation rate is 3.8% effective April 1, 2008. Rates will be evaluated in 2009 with UDOGM rates effective April 1. (BE)

Utah Sales tax is not 5.75%, please use 6.80% (Salt Lake County) (BE)

Please update costs reflective of 2008 dates: PM source (given July 2007), Undercarriage source (given June 8, 2007), Tire Cost Source (given June 8, 2007), Granite Seed (given March 30, 2007)

Where are the costs to remove the portable toilets? Will the contractor remove those? What are the costs associated with removal? (BE)

Where are the costs to dispose of the bone yard waste? (BE)

Please indicate if the laborer is skilled or general. (BE)

Does the equipment mobilization table include demob as well? Please clarify. If demob is not included, please add those costs. (BE)

The Division expects maintenance beyond revegetation is required. Costs should be included for erosion control maintenance and slope inspections/maintenance. (BE)

The Division assumes that 100% reseeding will occur. Please account for those costs and include equipment. The spreadsheet indicates that the area will be hand seeded. Perhaps the 'unseeded' dump faces can be hand seeded at this time. (BE)

General: The Division appreciates the efforts to compile the narrative portion of the surety calculation section. Please avoid using the word 'proposed' throughout the narrative. (BE)

In table form, please provide a list of equipment and quantities used in operations. Please be specific. For example, if using loaders, please describe size and brand. (BE)

The plan indicates BMPs and riprap and BMP's will be used on the quarry floors and slopes at reclamation, however, the costs aren't identified. (BE)

As always, the spreadsheets are well designed, please check cell size to ensure phrase and word truncation does not occur. Please adjust those words and phrases that are 'cut off'. (BE)

During the seeding process, the calculations account for one laborer, yet the broadcast seeder will be attached to the back of the dozer. It seems like an equipment operator would be required. (BE)

Please identify the cost for the broadcast seeder. (BE)

Figure 7 shows reseeding of haul roads yet spreadsheet D does not have any scarifying hours. Please explain or clarify. (BE)

Spreadsheet C has zero costs for Revegetation equipment (tractor). Please explain or clarify. (BE)

Spreadsheet C does not have costs for pit backfilling and grading, although the plan narrative and cross sections show it. Please direct to the location of these costs, or include. (BE)

Spreadsheet C does not show costs to apply growth media. (BE)

Per spreadsheet A comment that steep slopes will not be revegetated may require a Division variance. (BE)

Spreadsheet A does not show contour furrowing costs or if it does, it isn't clear. (BE)

There are no costs for stormwater and sediment controls placed or removed. (BE)

The Division believes the cost of an equipment operator is required for seed application on Spreadsheet B & C. (BE)

Figure 7 shows topsoil areas being revegetated, but not costs are seen for growth media placement. Please explain. (BE)

Spreadsheet E does not show disposal costs associated with the culvert removal. How will the 36" inch culvert be disposed of and what are the costs? (BE)

Does the travel costs of .505/mile include the vehicle? The Division would like to see more detail on Spreadsheet E, section A. Please indicate the number of estimated trips/year and the town traveling to/from, vehicle costs including maintenance. The Division assumes that an engineer or similarly qualified person should monitor the area for stability. Please add that cost. (BE)

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